



[www.coalitiontokeepmichiganwarm.org](http://www.coalitiontokeepmichiganwarm.org)

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**To:** MPSC Docket in Case No. U-18120 (mpscdockets@michigan.gov)

**Re:** Written Comments of the Coalition to Keep Michigan Warm<sup>1</sup>

**Date:** October 13, 2016

### **Comments of the Coalition to Keep Michigan Warm**

These written comments are submitted by the Coalition to Keep Michigan Warm. Since 1987, the Coalition to Keep Michigan Warm (Coalition) has worked to improve the availability of financial and human resources to meet the energy assistance needs of Michigan's low-income households. The members perform this mission through the exchange of information, developing new ideas, public education, and collaboration. Our membership includes non-profit organizations, energy providers, and other interested individuals and organizations which support the mission. The submission of these comments does not preclude any participating organization or entity from submitting comments, in the affirmative or the contrary, on matters included within these comments.

Over two years ago, the Commission began the process to revise the rules governing the billing of residential and nonresidential electric and natural gas service. Subsequently, the Commission issued its Order and Notice of Opportunity for Comment and Hearing on July 22, 2016, seeking written or oral comments on the proposed rules.

The Coalition commends the efforts of the Commission, but notes that as with the passage of time new information is often obtained, new models and best practices are developed, and situations arise even here in Michigan that necessitate a revisit of one or more items proposed within the rules. Of note, the Coalition to Keep Michigan Warm and several of its members recently participated in a collaborative effort under Case No. U-18098 affecting emergency and medical holds for utilities. Participation in the collaborative led to much discussion of which continued work must be done. Likewise, the collaborative discussed many key matters currently proposed or affected by the proposed rules. Given the timely discussions that took place and the proposed rules, the Coalition recommends the following:

- Include in the rules the development of one common form to be used by utilities for medical holds and one common form to be used for critical care customers. Such a form might be used in consultation or collaboration with one or more non-profits in the state.

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<sup>1</sup> These comments were approved by a 4/5 majority of voting eligible organizations.

- That the rules be amended to require utilities to code customer accounts as critical care customer accounts when customers voluntarily submit a completed standard form. Such forms and coding may require an annual renewal.
- That the rules prohibit remote disconnection of households with critical care customers that have voluntarily notified the utility with a completed form submitted within the last 12 months of the date of disconnection.
- That the rules be amended to include a 3 -business day grace period to the medical emergency hold to allow customers time to gather signed documents. This would continue the 21-day and 63-day maximum hold per person and no more than 126 days per household per year that would start once a completed standard form was submitted. The grace period would be offered only once per each 21-day submittal request.
- Eliminate deposits for restoration of service after a medical emergency restoration.

If the Commission supports modification to the proposed rules, the Coalition urges it to require its staff to seek input and feedback from energy providers and non-profits representing customers to ensure that the final adopted language does not lead to any unintended consequences. As such, the Coalition is prepared to provide any feedback and input on any specific language.

We appreciate the opportunity to comment.

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Since 1987, the Coalition to Keep Michigan Warm has worked to improve the availability of financial and human resources to meet the energy assistance needs of Michigan's low-income households. The members perform this mission through the exchange of information, developing new ideas, public education, and advocacy. **The Coalition to Keep Michigan Warm is the only voice in the state focused exclusively on low income household energy needs.**